

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

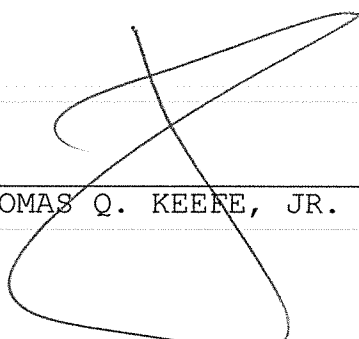
TERESA ALTHOFF,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No.
	)	
THE UNITED STATES OF AMERICA,	)	
SCOTT BRANNAN, M.D.,	)	
CAPE RADIOLOGY GROUP, P.C.,	)	
and SOUTHERN ILLINOIS	)	
HOSPITAL SERVICES,	)	
d/b/a MEMORIAL HOSPITAL OF	)	
CARBONDALE, a corporation,	)	
	)	
Defendants.	)	

**AFFIDAVIT**

THOMAS Q. KEEFE, JR. being duly sworn upon his oath deposes and states as follows:

1. That he is the attorney for the plaintiff herein.
2. That he has obtained all relevant medical records in this case and reviewed them, and likewise sent said records to a healthcare specialist.
3. That said healthcare specialist has reviewed said records and has determined that there is a reasonable and meritorious cause for the filing of this action.
4. That Thomas Q. Keefe, Jr., has likewise reviewed these records as well as the opinion of the healthcare provider and likewise concludes that there is a reasonable and meritorious basis for proceeding with this case against **SCOTT BRANNAN, M.D.**

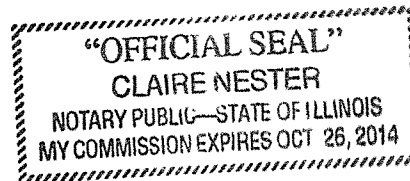
5. That it is the opinion of both the healthcare specialist and plaintiffs' counsel that the complained of acts or omissions on the part of the defendants proximately caused the damages complained of herein.

  
\_\_\_\_\_  
THOMAS Q. KEEFE, JR.

Subscribed and sworn to before me this 5<sup>th</sup> day of February, 2014.

  
\_\_\_\_\_  
Notary Public

**KEEFE & KEEFE, P.C.**  
**#6 Executive Woods Court**  
**Belleville, Illinois 62226**  
(618) 236-2221 (Phone)  
(618) 236-2194 (Fax)



CERTIFICATE OF MERIT

I am a licensed medical doctor and I have been engaged in the practice of medicine within the previous six (6) years. I am knowledgeable concerning the areas of medicine in this particular action. I have reviewed the pertinent medical documents concerning the care and treatment of Teresa Althoff.

In my opinion, based on the information reviewed and considered, SCOTT BRANNAN, M.D., deviated from the acceptable standards of medical practice by negligently and carelessly failing to properly place the catheter into the abscess during the percutaneous drainage procedure on November 23, 2011 and by negligently and carelessly perforating Teresa Althoff's iliac artery during the initial incorrect placement of the catheter during the percutaneous drainage procedure.

I believe one or more of these deviations contributed to cause Teresa Althoff's injuries and I therefore believe there is a reasonable and meritorious basis for this claim.